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Entropic Communications, LLC*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ENTROPIC COMMUNICATIONS, LLC,
Plaintiff,

v.

DISH NETWORK CORPORATION, *et al.*,

Defendants.

ENTROPIC COMMUNICATIONS, LLC,
Plaintiff,

v.

COMCAST CORPORATION, *et al.*,

Defendants.

ENTROPIC COMMUNICATIONS, LLC,
Plaintiff,

v.

COX COMMUNICATIONS, INC., *et al.*,

Defendants.

Case No.: 2:23-cv-01043-JWH-KES
Case No.: 2:23-cv-01047-JWH-KES
Case No.: 2:23-cv-01048-JWH-KES

[Assigned to the Hon. John W.
Holcomb]

**STIPULATION SETTING CLAIM
CONSTRUCTION SCHEDULE;
[PROPOSED] ORDER**

1 Plaintiff Entropic Communications, LLC (“Entropic”), on the one hand, and
2 Defendants Comcast Corporation, Comcast Cable Communications, LLC, and Comcast
3 Cable Communications Management, LLC (collectively, “Comcast” or “Comcast
4 Defendants”), Defendants Cox Communications, Inc.; Coxcom, LLC and Cox
5 Communications California LLC, (collectively, “Cox” or “Cox Defendants”), and
6 DISH Network Corporation, DISH Network L.L.C., Dish Network Service L.L.C. and
7 Dish Network California Service Corporation (collectively, “DISH” or “DISH
8 Defendants”) (inclusively, “Consolidated Defendants”), on the other hand, hereby
9 submit the following Stipulation and Proposed Order Setting Claim Construction
10 Schedule with reference to the following facts:

11 WHEREAS, on August 9, 2023, the Court ordered the parties to meet and confer
12 and submit a proposed schedule jointly through claim construction (*See* 1043 ECF No.
13 91; 1047 ECF No. 83; 1048 ECF No. 122);

14 WHEREAS, at the hearing on August 9, 2023, the Court also asked that the
15 parties submit an estimate of the number of terms to be construed at the *Markman*
16 hearing;

17 WHEREAS, Entropic estimates that it will request construction of up to twenty
18 terms;

19 WHEREAS, the Consolidated Defendants will be able to assess the number of
20 claim terms for construction after Entropic serves its infringement contentions and
21 identifies the asserted claims, which Entropic has not yet done;

22 WHEREAS, the parties reserve the right to revise these estimates based on, *inter*
23 *alia*, a meet and confer with the defendants’ outside counsel (once retained) in the
24 related action entitled *Entropic Communications, LLC v. DirecTV, LLC, et al.* Case No.
25 2:23-cv-05253-JWH-KES, filed on July 1, 2023 (C.D. Cal.) (“DirecTV Action”);

26 NOW, THEREFORE, based on the foregoing facts, the parties hereby stipulate
27 and respectfully request that the Court enter an Order with the following schedule:
28

Matter	Parties' Compromise Proposal
Claim Construction Hearing	Friday September 13, 2024
Reply Claim Construction Brief	Friday, August 23, 2024
Responsive Claim Construction Brief	Friday, August 2, 2024
Opening Claim Construction Brief	Tuesday, July 9, 2024
Completion of Claim Discovery	Friday, June 21, 2024
JCCS and Prehearing Statement, including Expert Declarations	Friday, May 31, 2024
Exchange of Proposed Constructions	Friday, May 3, 2024
Exchange of Terms Proposed for Construction	Friday, April 5, 2024
Disclosure of Invalidity Contentions and Accompanying Document Production	Tuesday, December 19, 2023
Disclosure of Asserted Claims and Infringement Contentions, and Accompanying Document Production	Friday, September 29, 2023

SIGNATURE CERTIFICATION

Pursuant to L.R. 5-4.3.4(a)(2)(i), I, Christina N. Goodrich, attest that all other signatories listed herein and on whose behalf the filing is submitted concur in the filing's content and have authorized the filing.

Dated: August 18, 2023

K&L GATES LLP

By: /s/ Christina Goodrich

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